

# **EXHIBIT C**

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**From:** Lazaroff, Michael S. <MLazaroff@reedsmith.com>  
**Sent:** Wednesday, February 24, 2021 1:46 PM  
**To:** McCallen, Benjamin; Bower, Elizabeth; Baio, Joseph; Antonello, Gabrielle; Fitzmaurice, James  
**Cc:** Solomon, Louis M.; david.stagman@katten.com; Kennedy, John P.  
**Subject:** RE: BSGR v. Soros - Plaintiffs' Supplemental Disclosures and RFPs

\*\*\* EXTERNAL EMAIL \*\*\*

Ben:

Per the proposed schedules and Judge Wang's order, we are focused now on responding to the requests for production and documents. We will respond/produce in the agreed upon and/or ordered time frame.

Please note that, as indicated in our supplemental initial disclosures, we do not represent Beny Steinmetz and cannot answer for him.

Thank you,

Michael Lazaroff  
mlazaroff@reedsmith.com

Reed Smith LLP  
599 Lexington Avenue  
New York, NY 10022-7650  
+1 212 5490412  
Fax +1 212 521 5450

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**From:** McCallen, Benjamin  
**Sent:** Tuesday, February 23, 2021 1:05 AM  
**To:** Kennedy, John P. ; Bower, Elizabeth ; Baio, Joseph ; Antonello, Gabrielle ; zz-Fitzmaurice, James  
**Cc:** Solomon, Louis M. ; Lazaroff, Michael S. ; david.stagman@katten.com  
**Subject:** RE: BSGR v. Soros - Plaintiffs' Supplemental Disclosures and RFPs

EXTERNAL E-MAIL - From [BMcCallen@willkie.com](mailto:BMcCallen@willkie.com)

Lou,

Will Mr. Steinmetz and Mr. Stagman make themselves available for depositions in this matter?

In addition, there are documents in plaintiffs' possession that are relevant and which should be producible quickly, such as documents from ICSID and LCIA related to the three issues in Judge Keenan's order. Plaintiffs conceded the relevance of those documents in the February 3 letter to Judge Wang, so there should be no need to wait for service of objections to our document requests to produce those. When will plaintiffs produce those documents?

Regards,

**Benjamin P. McCallen**

**Willkie Farr & Gallagher LLP**

787 Seventh Avenue | New York, NY 10019-6099

Direct: [+1 212 728 8182](tel:+12127288182) | Fax: +1 212 728 9182

[bmccallen@willkie.com](mailto:bmccallen@willkie.com) | [vCard](#) | [www.willkie.com bio](http://www.willkie.com/bio)

External Signed

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**From:** Kennedy, John P. <[JKennedy@reedsmith.com](mailto:JKennedy@reedsmith.com)>

**Sent:** Monday, February 22, 2021 7:45 PM

**To:** Bower, Elizabeth <[EBower@WILLKIE.COM](mailto:EBower@WILLKIE.COM)>; McCallen, Benjamin <[BMcCallen@willkie.com](mailto:BMcCallen@willkie.com)>; Baio, Joseph <[jbaio@willkie.com](mailto:jbaio@willkie.com)>; Antonello, Gabrielle <[GAntonello@willkie.com](mailto:GAntonello@willkie.com)>; Fitzmaurice, James <[JFitzmaurice@willkie.com](mailto:JFitzmaurice@willkie.com)>

**Cc:** Solomon, Louis M. <[LSolomon@reedsmith.com](mailto:LSolomon@reedsmith.com)>; Lazaroff, Michael S. <[MLazaroff@reedsmith.com](mailto:MLazaroff@reedsmith.com)>; [david.stagman@katten.com](mailto:david.stagman@katten.com)

**Subject:** BSGR v. Soros - Plaintiffs' Supplemental Disclosures and RFPs

\*\*\* EXTERNAL EMAIL \*\*\*

Counsel,

Attached are service copies of (a) Plaintiffs' Supplemental Disclosures 2-22-2021; (b) Plaintiffs' Second Request for Production on Soros 2-22-2021; and (c) Plaintiffs' Second Request for Production on OSF 2-22-2021.

Sincerely,

**John Kennedy**

+1 212 549 4186

[jkennedy@reedsmith.com](mailto:jkennedy@reedsmith.com)

*Pronouns: He/Him/His*

Reed Smith LLP

599 Lexington Avenue

New York, NY 10022-7650

+1 212 521 5400

+1 703 336 3119 (cell)

Fax +1 212 521 5450

\* \* \*

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